

STATE OF SOUTH CAROLINA

Application of

Communications Venture Corporation
d/b/a INdigital

for a Certificate of Public
Convenience and Necessity to Provide
Local Exchange and Interexchange
Telecommunications Services and for
Alternative and Flexible Regulation

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BEFORE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET

NUMBER: 2020 -015 - C

(Please type or print)

Submitted by: Lance J.M. Steinhart, P.C.

SC Bar Number: _____

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NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition expeditiously ☐ Request for item to be placed on Commission's Agenda ☐ Other: _____

| INDUSTRY (Check one) | NATURE OF ACTION (Check all that apply) | | |
|--|--|--|--|
| <input type="checkbox"/> Electric | <input type="checkbox"/> Affidavit | <input type="checkbox"/> Letter | <input type="checkbox"/> Request |
| <input type="checkbox"/> Electric/Gas | <input type="checkbox"/> Agreement | <input type="checkbox"/> Memorandum | <input type="checkbox"/> Request for Certification |
| <input type="checkbox"/> Electric/Telecommunications | <input type="checkbox"/> Answer | <input type="checkbox"/> Motion | <input type="checkbox"/> Request for Investigation |
| <input type="checkbox"/> Electric/Water | <input type="checkbox"/> Appellate Review | <input type="checkbox"/> Objection | <input type="checkbox"/> Resale Agreement |
| <input type="checkbox"/> Electric/Water/Telecom. | <input type="checkbox"/> Application | <input type="checkbox"/> Petition | <input type="checkbox"/> Resale Amendment |
| <input type="checkbox"/> Electric/Water/Sewer | <input type="checkbox"/> Brief | <input type="checkbox"/> Petition for Reconsideration | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Gas | <input type="checkbox"/> Certificate | <input type="checkbox"/> Petition for Rulemaking | <input type="checkbox"/> Response |
| <input type="checkbox"/> Railroad | <input type="checkbox"/> Comments | <input type="checkbox"/> Petition for Rule to Show Cause | <input type="checkbox"/> Response to Discovery |
| <input type="checkbox"/> Sewer | <input type="checkbox"/> Complaint | <input type="checkbox"/> Petition to Intervene | <input type="checkbox"/> Return to Petition |
| <input checked="" type="checkbox"/> Telecommunications | <input type="checkbox"/> Consent Order | <input type="checkbox"/> Petition to Intervene Out of Time | <input type="checkbox"/> Stipulation |
| <input type="checkbox"/> Transportation | <input type="checkbox"/> Discovery | <input checked="" type="checkbox"/> Prefiled Testimony | <input type="checkbox"/> Subpoena |
| <input type="checkbox"/> Water | <input type="checkbox"/> Exhibit | <input type="checkbox"/> Promotion | <input type="checkbox"/> Tariff |
| <input type="checkbox"/> Water/Sewer | <input type="checkbox"/> Expedited Consideration | <input type="checkbox"/> Proposed Order | <input type="checkbox"/> Other: |
| <input type="checkbox"/> Administrative Matter | <input type="checkbox"/> Interconnection Agreement | <input type="checkbox"/> Protest | |
| <input type="checkbox"/> Other: | <input type="checkbox"/> Interconnection Amendment | <input type="checkbox"/> Publisher's Affidavit | |
| | <input type="checkbox"/> Late-Filed Exhibit | <input type="checkbox"/> Report | |

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ACCEPTED FOR PROCESSING - 2020 February 3 12:00 PM - SCS - 2020-15-C - Page 1 of 8

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January 31, 2020

VIA OVERNIGHT DELIVERY

Chief Clerk of the Commission
South Carolina Public Service Commission
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210
(803) 896-5100

Re: Communications Venture Corporation d/b/a INdigital
Docket No. 2020-015-C

Dear Sir/Ma'am,

Enclosed please find for filing an original and one (1) copy of Communications Venture Corporation d/b/a INdigital's pre-filed testimony.

I have enclosed an extra copy of this letter to be date-stamped and returned to me in the self-addressed, postage prepaid envelope I have provided. If you have any questions or if we may provide you with any additional information, please do not hesitate to contact my office. Thank you.

Respectfully submitted,



Lance J.M. Steinhart, Esq.
Managing Attorney
Lance J.M. Steinhart, P.C.
Attorneys for
Communications Venture Corporation d/b/a INdigital

Enclosures

cc: Scott Elliot, Esq.

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2020-015-C

| | | |
|---|---|-------------------------|
| Application of |) | |
| |) | |
| Communications Venture Corporation |) | |
| d/b/a INdigital for a Certificate of Public |) | DIRECT TESTIMONY |
| Convenience and Necessity to Provide |) | OF MARK GRADY |
| Local Exchange and Interexchange |) | |
| Telecommunications Services and for |) | |
| Alternative and Flexible Regulation |) | |

Q. Please state your name and business address.

A. My name is Mark Grady and my business address is 1616 Directors Row, Fort Wayne, IN 46808.

Q. By whom are you employed and in what capacity?

A. I am the founder of Communications Venture Corporation D/B/A INdigital ("INdigital" or "Applicant") and have been President since its inception in 1995.

Q. Please state your qualifications.

A. See Exhibit C of INdigital's Application.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to describe the nature of INdigital's proposed service offering and to present evidence describing the technical, financial, and managerial fitness to provide the services within the State of South Carolina for which the authority is sought herein.

Q. Are all of the statements in INdigital's Application correct and true to the best of your knowledge, information, and belief?

A. Yes.

Q. Do you wish to incorporate by reference any documents in your testimony?

A. Yes. I wish to incorporate by reference INdigital's Application for a certificate of Public Certificate of Public Convenience and Necessity to provide resold and facilities-based local exchange (including exchange access) and interexchange telecommunications services ("Application") filed on this docket and its associated exhibits.

Q. Has INdigital registered with the Secretary of State to do business in South Carolina?

A. Yes. A copy of the Certificate of Authority is included as Exhibit A of the Application in this docket.

Q. Please describe the services INdigital intends to provide within the State of South Carolina.

A. INdigital principally proposes to offer 9-1-1 selective routing, switching, aggregation and call transport. The Applicant intends to provide emergency routing, transport, and related functionalities to state and municipal governmental agencies to support public service answering point (PSAP) operations. Applicant will rely primarily on existing facilities obtained from other carriers and utilities, but will construct its own facilities, as necessary.

Q. Does INdigital have authorization to provide telecommunications services in other states?

A. Yes. INdigital currently has authorization to provide telecommunications services in the following twenty-three

(23) states: Alabama, California, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Louisiana, Michigan, Mississippi, Missouri, Nebraska, New Hampshire, North Dakota, Ohio, Rhode Island, South Dakota, Tennessee, Texas, Vermont, West Virginia, and Wisconsin.

Q. Has INdigital ever had an application for a certificate for public convenience and necessity denied?

A. No.

Q. Does Applicant intend to file a tariff with the Commission?

A. Yes. A draft tariff was included as Exhibit D of the Application in this docket.

Q. How will Applicant bill for its services?

A. INdigital's customers will be billed according to individual case basis contracts negotiated with each customer. INdigital's customers typically are state and municipal governmental agencies.

Q. Does Applicant have offices in South Carolina?

A. No. INdigital does not intend to have offices in South Carolina, at this time. Accordingly, INdigital requests, pursuant to 26 S.C. Reg. 103-610, that the Commission allow it to keep its books and records at its principal place of business in Fort Wayne, Indiana. If Commission Staff or the South Carolina Office of Regulatory Staff (ORS) should desire to inspect such books or records, INdigital will provide them in a timely manner.

Q. How will INdigital market services in South Carolina?

A. INdigital intends to market services via direct sales by INdigital employees.

Q. Does INdigital intend to offer prepaid debit card services or retail residential local exchange service in South Carolina?

A. Not at this time. INdigital is aware of the Commissions \$5,000 bond or certificate of deposit requirements associated with prepaid debit card services, as well as the bond requirements of S.C. Code Ann. Regs. 103-607, and will file any such required instruments with the Commission should INdigital decide to offer these services in the future.

Q. Does INdigital have the requisite technical, financial, and managerial capabilities to the service for which it applied?

A. Yes.

Q. Please describe Applicant's financial abilities.

A. As demonstrated in the financial documents submitted as Confidential Exhibit B to INdigital's Application, INdigital has sufficient capital on hand to commence operations in the State of South Carolina and has access to additional capital as may be needed to sustain future growth and expansion. INdigital's business plan calls for the Company to provide its emergency call routing, transport, and related functionalities based upon contracts with state and municipal governmental agencies.

Q. Who is knowledgeable about INdigital's operation and will serve as the customer service contact for the Commission or ORS?

A. All ongoing compliance, customer complaint, and billing matters should be directed to Deborah Prather, Regulatory Director, 1616 Directors Row, Fort Wayne, IN 46808. Dprather@indigital.net. (260) 469-2143.

Q. Please describe the technical and managerial qualifications of INdigital.

A. INdigital's management team includes individuals with extensive experience in successfully developing and operating telecommunications businesses. Consequentially, the Company has the adequate internal technical resources to support its South Carolina operations. Specific details of the business and technical experience of INdigital's officers and management personnel were filed as Exhibit C of the Application in this docket.

Q. By what method will INdigital keep its financial records?

A. INdigital uses Generally Accepted Accounting Principles ("GAAP"). To the extent that the Commission's Rules require the use of the Uniform System of Accounts ("USOA"), INdigital requests a waiver of any USOA requirements.

Q. Will granting a Certificate serve the public interest of South Carolina consumers?

A. A decision by the Commission to grant INdigital authority to provide local exchange and interexchange telecommunications service is in the public interest. The public interest will be served by expanding the availability of competitive telecommunications services and enhanced telecommunications infrastructure in the State of South Carolina, thereby facilitating economic development. Authorizing INdigital to enter the telecommunications service market will increase the competitive choices available, and in turn create incentives for all carriers to lower prices, provide new and better quality services, and be more responsive to customer issues and demands.

Q. What regulatory treatment has INdigital sought in connection with this Docket?

A. INdigital requests flexible regulation for any future local service offerings as the Commission first granted in Order No. 98-165 in Docket No. 97-467-C. In addition, INdigital requests that all its future interexchange switched business service offerings be regulated pursuant to the procedures established in Commission Order Nos. 95-1734 and 96-55 in Docket No. 95-661-C, as modified by Commission Order No. 2001-997 in Docket No. 2000-407-C.

Q. Will INdigital comply with all applicable rules, regulations and orders of the Commission?

A. Yes.

Q. Does this conclude your testimony?

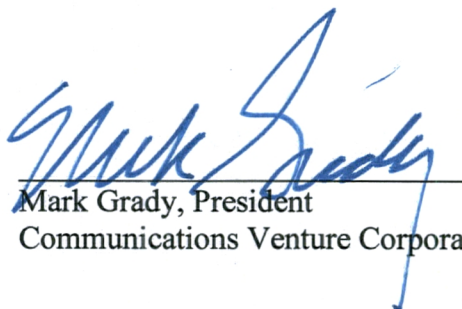
A. Yes.

State of Indiana)
 County of Elkhart)

VERIFICATION

Personally appeared before the undersigned, an officer duly authorized to administer oaths, I, Mark Grady, first being duly sworn, depose and state that I am President of Communications Venture Corporation d/b/a INdigital ("INdigital" or the "Company") and do hereby declare under penalty of perjury that I have read my Direct Testimony and know the contents thereof, which was filed in support of INdigital's Application for Certificate of Public Convenience and Necessity to Provide Interexchange and Local Exchange Telecommunications Services in the State of South Carolina, that said contents are true in substance and in fact, except as to matters stated upon information and belief, and as to those, I believe the same to be true.

Dated: 24-January, 2020


 Mark Grady, President
 Communications Venture Corporation d/b/a INdigital

Subscribed and sworn to before me this 24th day of January 2020.

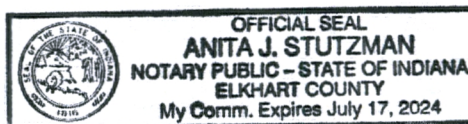


(Notary Seal)

My commission expires:

July 17, 2024


 Notary Public




Commission #685411

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-15-C

| | | |
|--|---|-------------------------------|
| Application of |) | |
| |) | |
| Communications Venture Corporation |) | |
| d/b/a INdigital for a Certificate of Public |) | CERTIFICATE OF SERVICE |
| Convenience and Necessity to Provide |) | |
| Local Exchange and Interexchange |) | |
| Telecommunications Services and for |) | |
| Alternative and Flexible Regulation |) | |

The undersigned certifies that on the 31st day of January, 2020, a true and correct copy of the **Direct Testimony of Mark Grady** was delivered via electronic mail to members of the attached service list.



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Service List For Docket 2020-15-C

**Application of Communications Venture Corporation d/b/a INdigital for a Certificate of Public
Summary: Convenience and Necessity to Provide Local Exchange and Interexchange Telecommunications
Services, and for Alternative and Flexible Regulation**

Industry: Telecommunications

Opened: 1/7/2020

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